

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

BLACKBIRD TECH LLC d/b/a  
BLACKBIRD TECHNOLOGIES,

Plaintiff,

v.

3NLED Lighting USA, Inc.

Defendant.

C.A. No. 15-63 (RGA)

**MOTION FOR PERMISSION TO WITHDRAW AS COUNSEL**

Pursuant to Local Rule 83.7, Richards, Layton & Finger, P.A. (“Richards, Layton & Finger”) moves this Court for an Order permitting Richards, Layton & Finger to withdraw as counsel for 3NLED Lighting USA, Inc. (“3NLED”) in this matter. In support of this motion, Richards, Layton & Finger states as follows:

1. Richards, Layton & Finger was engaged by 3NLED for the limited purpose of acting as local Delaware counsel for 3NLED in this action. The law firm of Huntsman Law Group, PLLC was engaged by 3NLED to act as lead counsel for 3NLED in this action.

2. 3NLED has failed substantially in its obligations to Richards, Layton & Finger making it unreasonably difficult for Richards, Layton & Finger to continue the representation. Among other things, 3NLED has stopped returning e-mails and telephone calls from attorneys at Huntsman Law Group, PLLC, making it impossible for Richards, Layton & Finger to continue representation of 3NLED and to honor its obligations to this Court. Richards, Layton & Finger has been unable to receive any direction from 3NLED with regards to this litigation and cannot continue to represent it.

3. Richards, Layton & Finger provided notice to 3NLED on April 1, 2016 informing them that Richards, Layton & Finger is withdrawing from representation of 3NLED. 3NLED

has been advised that Richards, Layton & Finger was filing the instant motion and that it should seek legal representation to assist it in the above-caption matter.

4. This case is still in its early stages and withdrawal will not prejudice either side.

5. Pursuant to Local Rule 83.7, this Motion is being served on 3NLED by certified mail at its last known address. Additional copies of this motion have been sent to 3NLED by electronic delivery.

WHEREFORE, Richards, Layton & Finger respectfully requests that this Court enter an Order in the form attached hereto permitting Richards, Layton & Finger to withdraw as counsel to 3NLED.

OF COUNSEL:

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*/s/ Kelly E. Farnan*

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*Attorneys for Defendant 3NLED  
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Dated: April 18, 2016